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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SAN JUAN NAVIGATION  
(SINGAPORE) PTE. LTD.,

08 CV 1562 (RMB)

Plaintiff,

- against -

TRANS POWER CO. LTD.,

Defendant.

**NOTICE OF MOTION UNDER RULE E OF THE  
SUPPLEMENTAL RULES FOR CERTAIN  
ADMIRALTY AND MARITIME CLAIMS AND LOCAL  
ADMIRALTY RULE E.1 FOR VACATUR OR  
REDUCTION OF PLAINTIFF'S MARITIME  
ATTACHMENT AND, OR IN THE ALTERNATIVE,  
FOR COUNTERSECURITY**

**PLEASE TAKE NOTICE THAT**, upon the accompanying memorandum of law, Notice of Foreign Law dated March 17, 2008 and Declaration of Nicholas Woo dated March 17, 2008 Defendant, will move this Court before the Hon. Richard Berman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to Rule E(4)(f) of the

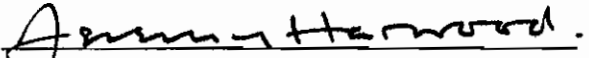
Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure vacating or reducing the amount of security and/or substitute security that Plaintiff has attached and granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE THAT**, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York  
March 17, 2008

Respectfully submitted,

BLANK ROME LLP

By:   
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*Attorneys for Defendant*